

1 PHILLIP A. TALBERT
United States Attorney
2 ELLIOT WONG
Assistant United States Attorney
3 501 I Street, Suite 10-100
Sacramento, CA 95814
4 Telephone: (916) 554-2700
Facsimile: (916) 554-2900
5

6 Attorneys for Defendants

7
8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA

10 IBRAHIM KADHIM,

11 Plaintiff,

12 v.

13 ROHIT NEPAL, ET AL.,

14 Defendants.

CASE NO. 2:23-CV-01318-AC

STIPULATION AND ~~PROPOSED~~ ORDER FOR
FOURTH EXTENSION OF TIME

15
16
17 The Defendants respectfully request a fourth extension of time in which to respond to the
18 Complaint, and counsel for Plaintiff does not oppose. This case concerns the visa applications of
19 Plaintiff's daughter and grandson. The visa case of Plaintiff's relatives is currently refused for
20 administrative processing, following a September 2022 consular interview. On February 11, 2024, the
21 consular officer contacted the visa applicants to request updated documents. The parties anticipate that
22 this lawsuit will soon be rendered moot once the visa applicants return the requested documentation and
23 the Department of State completes its adjudication of the visa case.

24 ///

25 ///

26 ///

27 ///

1 The parties therefore stipulate that the new date for Defendants to file an answer or other
2 dispositive pleading is April 29, 2024. The parties further request that all other filing deadlines be
3 similarly extended.

4
5 Respectfully submitted,

6
7 Dated: February 21, 2024

PHILLIP A. TALBERT
United States Attorney


8
9 By: /s/ ELLIOT C. WONG
10 ELLIOT C. WONG
Assistant United States Attorney

11
12 /s/ JOSHUA L. GOLDSTEIN
13 JOSHUA L. GOLDSTEIN
Counsel for Plaintiff

14
15 [~~PROPOSED~~] ORDER

16 It is so ordered.

17
18
19 Dated: February 22, 2023

20 
21 ALLISON CLAIRE
UNITED STATES MAGISTRATE JUDGE